

**Cayetano Heredia University Expansion – PERÚ  
Environmental and Social Action Plan – ESAP**

No.	Aspect	Action	Deliverable	Delivery Date
<b>PS1: Assessment and Management of E&amp;S Risks and Impacts</b>				
1.1	Environmental and Social Management System	1. Update the environmental and social management system (ESMS) to include all UPCH campuses.	1. UPCH's ESMS documents.	1. Within 180 days after signing the loan agreement.
		2. Implement the updated ESMS in all UPCH campuses.	2. Evidence of implementation.	2. Periodically in the Environmental and Social Compliance Report (ESCR)
		3. Update the ESMS for the Project construction phase.	3. The ESMS document for the Project.	3. Within 60 days after signing the loan agreement.
		4. Implement the updated ESMS for the Project.	4. Evidence of implementation	4. As part of the ESCR
1.2	Policy	1. Disseminate the institutional environmental policies among the direct (students, faculty, clerical staff) and indirect staff.	1. Evidence of disclosure	1. Within 90 days after signing the loan agreement, and later as part of the ESCR.
		2. Disseminate the comprehensive environmental, and occupational health and safety policy among all direct and indirect workers involved in the Project.	2. Evidence of disclosure	2. Within 30 days after signing the loan agreement, and later as part of the ESCR.
1.3	Identification of risks and impacts	1. Develop a procedure to identify and assess environmental risks and impacts for UPCH's operations in all its campuses.	1. Procedure to identify and assess the environmental and social risks and impacts	1. Within 120 days after signing the loan agreement.
		2. Prepare an environmental risk matrix for each UPCH campus.	2. Matrix to identify and assess the environmental risks and impacts	2. Within 180 days after signing the loan agreement.
		3. Prepare a social risk matrix for each UPCH campus.	3. Matrix to identify and assess the social risks and impacts.	3. Within 180 days after signing the loan agreement.
		4. Develop a procedure to identify and assess the environmental risks and impacts of the Project.	4. Procedure to identify and assess the environmental and social risks and impacts of the Project.	4. Within 30 days after signing the loan agreement.
		5. Prepare an environmental risk matrix for the Project.	5. Matrix to identify and assess the environmental risks and impacts of the Project.	5. Within 30 days after signing the loan agreement.
		6. Produce a social risk matrix for the Project.	6. Matrix to identify and assess the social risks and impacts for the Project.	6. Within 60 days after signing the loan agreement.
		7. Develop a quantitative and qualitative social baseline for all potentially affected stakeholders.	7. Social baseline for the Project.	7. Within 30 days after signing the loan agreement.
	Gender risks	8. Update UPCH's sexual harassment prevention and sanction procedure applicable to faculty members, students and graduates to: (i) expand the number of channels to receive incident reports; and (ii) allow for anonymous reporting.	8. Updated UPCH's sexual harassment prevention and sanction procedure, applicable to faculty members, students and graduates.	8. Within 90 days after signing the loan agreement.
		9. Disseminate UPCH's updated sexual harassment prevention and sanction procedure, applicable to faculty members, students and graduates.	9. Evidence of dissemination.	9. Within 120 days after signing the loan agreement, and later as part of the ESCR.
		10. Update UPCH's sexual harassment prevention and sanction procedure applicable clerical staff to: (i) expand the number of channels to receive incident reports; and (ii) allow for anonymous reporting.	10. UPCH's updated sexual harassment prevention and sanction procedure, applicable to clerical staff.	10. Within 90 days after signing the loan agreement.
		11. Disseminate UPCH's updated sexual harassment prevention and sanction procedure, applicable to clerical staff.	11. Evidence of dissemination.	11. Within 120 days after signing the loan agreement, and later as part of the ESCR.

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1.4	Management programs	1. Produce an environmental program to monitor the air quality and environmental noise for the Project.	2. Environmental monitoring program	2. Within 30 days after signing the loan agreement.
		2. Implement the environmental monitoring program for the Project.	3. Evidence of implementation	3. Periodically in the ESCR.
1.5	Organizational capacity and competency	1. Appoint one or more employees to be in charge of developing and implementing UPCH's ESMS across its campuses.	1. Documentary evidence of appointment	1. Before financial closing.
		2. Appoint one or more employees to be in charge of social management actions for the Project and all campuses.	2. Documentary evidence of appointment.	2. Within 30 days after signing the loan agreement.
		3. Adopt an organizational system that governs the relations between the Client and its contractors, defining also the applicable communication channels.	3. Organizational structure document.	3. Within 30 days after signing the loan agreement.
		4. Train the direct and indirect staff (contractors and subcontractors) periodically in the content of the ESMS.	4. Evidence of training.	4. As part of the ESCR.
1.6	Emergency preparedness and response	1. Train the Project direct and indirect staff on the emergency preparedness and response plan.	1. Evidence of training	1. Within 30 days after signing the loan agreement.
		2. Establish emergency response teams for the Project.	2. Evidence of formation.	2. Within 30 days after signing the loan agreement.
		3. Produce a training plan for the emergency response teams.	3. Training plan.	3. Within 30 days after signing the loan agreement.
		4. Implement the training plan.	4. Evidence of implementation.	4. As part of the ESCR.
		5. Perform emergency drills, involving the external support institutions and neighboring communities.	5. Report on the drills.	5. Within 60 days after signing the loan agreement.
1.7	Monitoring and review	1. Develop a procedure to assess how its ESMS is being managed, including KPIs.	1. Procedure to assess how its ESMS is being managed.	1. Within 180 days after signing the loan agreement.
		2. Implement the procedure to assess how its ESMS is being managed.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Develop an internal or external auditing program to assess ESMS performance.	3. Internal or external auditing program.	3. Within 270 days after signing the loan agreement.
		4. Implement the internal or external auditing program	4. Evidence of implementation.	4. As part of the ESCR.
		5. Develop a legal and contractual compliance matrix, which includes: (i) the control agency that issues the permit or license; (ii) the issuance and expiration dates; and (iii) the internal staff responsible for renewing them.	5. Legal and contractual compliance matrix.	5. Within 120 days after signing the loan agreement.
		6. Keep the legal and contractual compliance matrix up to date.	6. Updated legal and contractual compliance matrix.	6. As part of the ESCR.
1.8	Stakeholder engagement	1. Produce a stakeholder engagement procedure (SEP) for each UPCH campus.	1. Stakeholder engagement procedure.	1. Within 180 days after signing the loan agreement.
		2. Implement the SEP.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Produce a stakeholder engagement procedure (SEP) for the Project.	3. Stakeholder engagement procedure.	3. Within 60 days after signing the loan agreement.
		4. Implement the SEP for the Project.	4. Evidence of implementation.	4. As part of the ESCR.
1.9	Disclosure of information	1. Prepare a plan to disclose information about environmental and social performance for all UPCH campuses.	1. Information disclosure plan.	1. Within 300 days after signing the loan agreement.
		2. Implement the plan to disclose information about UPCH operations.	2. Evidence of implementation.	2. As part of the ESCR.
		3. Prepare a plan to disclose information about the environmental and social performance of the Project.	3. Information disclosure plan.	3. Within 45 days after signing the loan agreement.
		4. Implement the plan to disclose information about the Project.	4. Evidence of implementation.	4. As part of the ESCR.
1.10	Informed consultation & participation	1. Implement the citizen engagement process for the Project.	1. Evidence of implementation.	1. Within 30 days after signing the loan agreement.

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1.11	Community grievance mechanism	1. Develop an external grievance mechanism for all UPCH campuses.	1. External grievance mechanism.	1. Within 180 days after signing the loan agreement.
		2. Disseminate the external grievance mechanism to the relevant stakeholders.	2. Evidence of dissemination.	2. Within 210 days after signing the loan agreement, and later as part of the ESCR
		3. Produce an external grievance mechanism for the Project.	3. External grievance mechanism.	3. Within 30 days after signing the loan agreement
		4. Disseminate the external grievance mechanism for the Project.	4. Evidence of dissemination.	4. Within 45 days after signing the loan agreement, and later as part of the ESCR
<b>PS2: Labor and Working Conditions</b>				
2.1	Human resources policies and procedures	1. Prepare a human resources policy that is commensurate with the size of its workforce and includes the direct and indirect employees as well as those working in the supply chain, in compliance with the requirements of the national legislation and the ILO's international conventions.	1. Human resources policy.	1. Within 180 days after signing the loan agreement
		2. Disseminate the human resources policy among its direct personnel (faculty and clerical staff) and contractors.	2. Evidence of dissemination.	2. Periodically in the ESCR.
2.2	Grievance mechanism	1. Develop an internal grievance mechanism for all UPCH campuses.	1. Internal grievance mechanism.	1. Within 120 days after signing the loan agreement
		2. Disseminate the internal grievance mechanism among the direct and indirect personnel (contractors and suppliers).	2. Evidence of dissemination.	2. As part of the ESCR
2.3	Protecting the workforce	1. Update the Internal Work Rulebook Regulation (IWR) to include provisions of zero tolerance for child and forced labor, and to make it applicable to contractors and suppliers as well.	1. Updated IWR.	1. When the IWR is updated
2.4	Occupational health and safety	1. Update the Annual Occupational Agents Monitoring Plan (AOAMP) to include measuring Project-induced vibrations during construction.	1. Updated AOAMP	1. Within 30 days after signing the loan agreement
		2. Implement the AOAMP.	2. Evidence of implementation	2. Within 60 days after signing the loan agreement, and later as part of the ESCR
		3. Hold periodic meetings with the Occupational Health and Safety Committee (OHSC).	3. Meeting summary	3. As part of the ESCR
		4. Develop safe work written procedures (SWWPs) for all the activities identified in the HIRA matrix of the Project.	4. SWWPs for the Project	4. Within 30 days after signing the loan agreement
		5. Implement the SWWPs for the Project construction phase.	5. Evidence of implementation	5. As part of the ESCR
		6. Produce SWWPs for all UPCH campuses.	6. SWWPs for all UPCH campuses	6. Within 120 days after signing the loan agreement
		7. Implement the SWWPs for all UPCH campuses.	7. Evidence of implementation	7. As part of the ESCR
2.5	Provisions for people with disabilities	1. Reach the hiring quota of people with disabilities as required by law.	1. Evidence of compliance	1. As part of the ESCR
2.6	Workers engaged by third parties	1. Prepare a contractor management plan with measures to monitor compliance with the environmental and OHS legislation, policies, procedures and plans.	1. Contractor management plan	1. Within 45 days after signing the loan agreement
		2. Implement the contractor management plan.	2. Evidence of implementation	2. As part of the ESCR
2.7	Supply chain	1. Develop a supplier management procedure.	1. Supplier management procedure	1. Within 180 days after signing the loan agreement
		2. Implement the supplier management procedure	2. Evidence of implementation	2. As part of the ESCR
<b>PS3: Resource Efficiency and Pollution Prevention</b>				

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3.1	Greenhouse gases	1. Carry out an inventory of GHG emissions for the Project.	1. Inventory of GHG emissions for the Project	1. As part of the Project ESCR
3.2	Water consumption	1. Develop a water efficiency program for the construction activities.	1. Water efficiency program for the construction activities	1. Within 30 days after signing the loan agreement
		2. Implement a water efficiency program for the construction activities	2. Evidence of implementation	2. As part of the Project ESCR
3.3	Pollution prevention	1. Implement the environmental monitoring program of the EMAP for the Project construction phase.	1. Evidence of implementation	1. As part of the ESCR
		2. Implement the comprehensive solid and liquid waste management plan for the Project.	3. Evidence of implementation	3. As part of the ESCR
		3. Keep a traceability record of all hazardous and non-hazardous waste generated by the Project.	4. Records of waste and certificates of disposal.	4. As part of the ESCR
	Hazardous materials management	5. Prepare a hazardous materials management procedure for the Project.	5. Hazardous materials management procedure for the Project	5. Within 30 days after signing the loan agreement
		6. Implement the hazardous materials management procedure for the Project.	6. Evidence of implementation	6. As part of the ESCR
		7. Prepare a hazardous materials management procedure for all UPCH campuses.	7. Hazardous material management procedure	7. Within 120 days after signing the loan agreement
		8. Implement the hazardous materials management procedure for all UPCH campuses.	8. Evidence of implementation	8. As part of the ESCR
		<b>PS4: Community Health and Safety</b>		
4.1	Community health, safety and security	1. Update the road impact mitigation plan (RIMP) for the Project to include road emergency and contingency preparedness and response plans.	1. Updated road impact mitigation plan for the Project	1. Within 30 days after signing the loan agreement
		2. Disseminate the updated RIMP for the Project.	2. Evidence of dissemination	2. Within 30 days after signing the loan agreement
		3. Implement the updated RIMP for the Project.	3. Evidence of implementation	3. As part of the ESCR
4.2	Infrastructure and equipment design and safety	1. Produce a certificate issued by a professional qualified in life and fire safety systems (L&FS) showing that: (i) all Project facilities and buildings were built in accordance with approved L&FS designs; (ii) all equipment units have been installed according to the L&FS design, and (iii) all L&FS equipment units have been tested following international requirements.	1. L&FS certification	1. 30 days prior to the start of the O&M phase
4.3	Security personnel	1. Develop a physical security management plan that includes, among other aspects, a training plan for the security personnel in human rights and the progressive use of force.	1. Physical security forces management plan	1. 90 days after signing the loan agreement
		2. Implement the security forces management plan	2. Evidence of implementation	2. As part of the ESCR
<b>PS8: Cultural Heritage</b>				
8.1	Chance finds procedure	1. Develop a chance finds management procedure for the Project.	1. Chance finds management procedure	1. Before starting a new Project
		2. Disseminate the chance finds management procedure among contractors and subcontractors.	2. Evidence of dissemination	2. Before starting a new Project